

EXHIBIT 8

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
MDL-NO. 16-2738 (FLW) (LHG)

IN RE: JOHNSON & JOHNSON

TALCUM POWDER PRODUCTS

ORAL DEPOSITION OF:

MARKETING, SALES PRACTICES,

DANIEL L.
CLARKE-PEARSON, MD

AND PRODUCTS LIABILITY

VOLUME 1

LITIGATION

* * * *

THURSDAY, AUGUST 26, 2021

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MASTROIANNI & FORMAROLI, INC.

Certified Court Reporting & Videoconferencing

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1 **contribution to her developing ovarian cancer from**
2 **talcum powder was her perineal application over 45**
3 **years.**

4 Q. And have you attempted to determine how
5 much talc Ms. Converse was exposed to over the time
6 period she claims to have used talc?

7 MS. THOMPSON: Object to form.

8 THE WITNESS: I'm not quite sure
9 what -- you're asking me to quantitate, is that --

10 BY MS. BROWN:

11 Q. Sure.

12 A. **I don't think anybody can quantitate**
13 **that. We just knew the frequency that she was using**
14 **it.**

15 Q. And is there a specific amount of
16 talcum powder, in your mind, that a woman like
17 Ms. Converse needs to use to have talc be the cause
18 of her ovarian cancer?

19 MS. THOMPSON: Objection.

20 THE WITNESS: I don't think we have --
21 we don't have a specific amount, that I'm aware of.

22 BY MS. BROWN:

23 Q. Do you believe that Ms. Converse's
24 clear cell ovarian cancer was caused by asbestos?

25 MS. THOMPSON: Objection.

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1 THE WITNESS: No. I don't know that
2 that -- there is no evidence of that.

3 BY MS. BROWN:

4 Q. Do you believe that Ms. Converse's
5 ovarian cancer was caused by heavy metals?

6 MS. THOMPSON: Objection.

7 THE WITNESS: Let me rephrase it that I
8 don't know what it is about talcum powder that caused
9 her ovarian cancer.

10 Could it be heavy metals? Could it be
11 fragrances? Could it be asbestos that we're not
12 aware of?

13 I would just say that Johnson's Baby
14 Powder causes ovarian cancer. Whatever the
15 constituents are, I don't think anybody can pin that
16 down.

17 BY MS. BROWN:

18 Q. You're not offering an opinion is it
19 relates to Hilary Converse that it was a particular
20 contaminant of Johnson's Baby Powder that caused her
21 ovarian cancer, is that fair?

22 **A. That's fair.**

23 Q. You are not going to come to trial and
24 say it was asbestos contamination in some bottles she
25 used that caused her ovarian cancer, is that fair?

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1 MS. THOMPSON: Objection.

2 THE WITNESS: I will not be saying that
3 unless there is new evidence.

4 BY MS. BROWN:

5 Q. Okay. And the same would be true for
6 heavy metals or fragrances, you're not going to come
7 to trial and say it's the particular heavy metal or a
8 particular fragrance component of baby powder that
9 caused her ovarian cancer?

10 MS. THOMPSON: Objection.

11 THE WITNESS: I will just be saying
12 Johnson's Baby Powder was one of the causes of her
13 ovarian cancer.

14 BY MS. BROWN:

15 Q. Are you aware of whether or not any
16 bottle of Johnson's Baby Powder that Ms. Converse
17 claims to have used was ever tested for any potential
18 contaminants?

19 A. **I didn't see any of that in the**
20 **depositions.**

21 Q. Have you ever determined the cause of
22 an individual woman's clear cell ovarian cancer?

23 MS. THOMPSON: Objection.

24 THE WITNESS: I think there are causes.
25 We don't stick with one cause, but there is multiple

1 THE WITNESS: Yes.

2 BY MS. BROWN:

3 Q. I had asked you some questions before
4 about whether or not you were going to opine that
5 asbestos or heavy metals or fragrances is what caused
6 Ms. Converse's cancer. Do you recall those
7 questions?

8 A. Yes.

9 Q. I inadvertently left out fibrous talc.

13 MS. THOMPSON: Objection.

14 THE WITNESS: It's certainly a
15 possibility. I keep saying that whatever is in
16 talcum powder caused her ovarian cancer was a cause
17 of her ovarian cancer.

18 BY MS. BROWN:

19 Q. And I think what you mean by that,
20 Doctor, is whatever the product was that was studied
21 in the epidemiology is the product that you're
22 opining on?

23 MS. THOMPSON: Objection.

24 THE WITNESS: Yes.

25 BY MS. BROWN: